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Attorney for GMW Fire Protection, Inc.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

	)	
THE UNITED STATES for the use of	)	
GMW Fire Protection, Inc.,	)	
an Alaska Corporation,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
KANAG'IQ CONSTRUCTION CO., INC.,	)	
an Alaska Corporation and	)	
WESTERN SURETY COMPANY, a	)	
South Dakota Corporation,	)	
	)	
Defendant.	)	
<hr/>		) Case No. A-05-0170 CV (TMB)

GMW'S PREJUDGMENT INTEREST CALCULATIONS

Pursuant to Local District Court Rule 58.1(d), GMW submits the following prejudgment interest calculations for to the judgment entered on January 29, 2008.

All of GMW's final billings on delivery orders 5008 through 5018 were sent on or before 12-31-04.<sup>1</sup> GMW proposes, for the ease

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<sup>1</sup> Final invoices sent: for 5008 on 11-26-04 (Trial Exhibit 30); for 5009 on 09-24-04 (Trial Exhibit 35); for 5010 on 11-26-04 (Trial Exhibit 44); for 5011 on 09-27-04 & 12-24-04 (Trial Exhibits 55 and 57); for 5012 on 08-25-04 (Trial Exhibit 62); for 5013 on 03-08-04 (Trial Exhibit 67); for 5014 on 07-25-04 (Trial Exhibits & 137); for 5015 on 12-24-04 (Trial Exhibit 85); for 5016 on 12-24-

of computation, that prejudgment interest commence on January 1, 2005, and be set at the rate of 7.75%<sup>2</sup> as allowed in Alaska<sup>3</sup> as follows:

$\$533,848.77 \times 7.75\% \div 365 = \$113.35$  daily interest

$\$113.35 \times 1,123$  days (January 1, 2005 through January 28, 2008) =  $\$127,292.05$  total prejudgment interest.

RESPECTFULLY SUBMITTED this 31st day of January, 2008.

s/ Sarah J. Tugman  
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Alaska Bar No.: 8310101

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2008, a copy of the foregoing document was served electronically on Tom Gingras, attorney for Kanag'Iq Construction, Inc.

s/Sarah J. Tugman  
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04 (Trial Exhibit 94); for 5017 on 10-26-04 (Trial Exhibit 106); and for 5018 on 04-25-04 (Trial Exhibit 113). See also Trial Exhibit 137.

<sup>2</sup> See Exhibit 1.

<sup>3</sup> *In re Exxon Valdez, Sea Hawk Seafoods, Inc. v. Exxon Corp.*, 484 F.3d 1098, 1101 (9<sup>th</sup> Cir. 2007)